

EXHIBIT D

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

**DECLARATION OF GENE LOCKS, ESQUIRE IN SUPPORT OF CO-LEAD CLASS
COUNSEL'S PETITION FOR AN AWARD OF ATTORNEY'S FEES AND
REIMBURSEMENT OF COSTS AND EXPENSES**

I, Gene Locks, Esquire, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner in the law firm known as the Locks Law Firm "(LLF)", located in Philadelphia, Pennsylvania. As one of four Class Counsel, I submit this declaration in support of Co-Lead Class Counsel's Petition for an Award of Attorney's Fees and Reimbursement of Costs and Expenses in connection with and for services rendered and expenses incurred for the common benefit of the Settlement Class in the above-captioned multidistrict litigation ("Action") from the inception of the above-captioned litigation through June 30, 2016, as well as for the

payment of expenses incurred therewith. I have personal knowledge of the matters set forth in this declaration and, if called upon, I could and would testify competently thereto.

2. LLF was involved at the inception of these cases both when the initial complaints were filed on behalf of multiple players.

3. By January 2012, LLF represented approximately 200 retired players, most of whom had filed personal injury complaints against the NFL parties ("NFL") in various courts around the country, including this Court. That number expanded through the time-period of 2012 to approximately 1400 players.

4. LLF took a leadership role at the outset in early 2012, attended the first organizational meeting of plaintiffs' counsel and helped organize the Plaintiffs Steering and Executive Committees, which the Court appointed.

5. LLF took a leading role in researching and developing the case on a class-wide basis from both a medical and legal standpoint LLF took the lead in retaining both legal and medical experts: Professor Tobias Barrington Wolff of the University of Pennsylvania Law School, an expert on Rule 23, to advise on all legal issues, and Donald H. Silberberg, M.D., Chair Emeritas of the Department of Neurology of the University of Pennsylvania to advise on all medical issues. Both were instrumental in providing guidance on the substance of the Personal Injury Master Complaint and the Medical Monitoring Class Action Complaint.

6. LLF partner David Langfitt researched and drafted, along with two other Executive Committee members, the Personal Injury Master Complaint, which was filed pursuant to an Order of this Court in early summer 2012. The Medical Monitoring Class Action Complaint was modeled off the Master Personal Injury Complaint.

7. Those Complaints were the foundation of the current case, gained nationwide publicity for the cause, and focused the plaintiffs and defendants on a central pleading.

8. By the time this Court appointed two members of LLF (I, Gene Locks, and David Langfitt) as members of the Plaintiffs Executive Committee in the spring of 2012, LLF represented approximately 1000 retired players, all of whom had filed, or were in the process of filing, personal injury cases against the NFL.

9. LLF was directly involved in the drafting of opposition papers and the hearing related to the NFL's Motion to Dismiss on the grounds of pre-emption.

10. By agreement of Co-Lead Counsel, I, Gene Locks, was appointed within the Executive Committee as Settlement Counsel for settlement discussions ordered by the Court.

11. I directly participated in settlement discussions ordered by the Court while the NFL's Motion to Dismiss was pending. During those discussions, LLF prepared a substantial injury database – primarily involving the clients represented by Class Counsel and particularly clients represented by LLF – that Plaintiffs' counsel used to convey to the NFL the nature of the diseases and injuries sustained by the retired players. The parties used the database to develop a framework for settlement.

12. During those discussions, I substantially relied on the advice and counsel of my partners and, in part, Professor Wolff and Dr. Silberberg, in formulating a term sheet that was legally and scientifically supportable, was based on the best factual evidence of injury and causation that we had at that time, and was consistent with a reasonable compromise.

13. At all times, the compromise and accord was designed to settle the matter efficiently and reasonably, bearing in mind that further risks of litigation were unpredictable and

presented the unwanted possibility of many years, possibly decades, of litigation and appeals while retired players died and families disintegrated.

14. At all times, we within the Plaintiffs settlement leadership, now Class Counsel, understood that the Court desired a reasonable and effective settlement structure, and we strived to provide that.

15. Once the Plaintiffs and NFL reached a term sheet in August of 2013, LLF's role changed and became critical to making sure the vast LLF client base and their retired player friends and families understood the basis of the term sheet, the purpose of the accord and compromise, and the role of the Court in protecting the absent class members.

16. Throughout 2013 and 2014, LLF explained to every class member and family member who inquired (many of whom were not clients of LLF) how the settlement structure effected each player and family, the value of the compromise and accord for the class, together with the long-term risks of further litigation, and the fiduciary role of the Court with respect to the absent class members.

17. Very few retired players with whom LLF communicated either objected or opted-out of the Settlement Agreement. LLF's leadership in that regard created a ripple effect in the retired player community, which overwhelmingly accepted the compromise and accord as reasonable under all of the complex circumstances of this case.

18. LLF also was instrumental in interacting with a very large number of neurologists and neuropsychologists throughout the nation, a collateral benefit of which was their recruitment into and future participation in the BAP and MAF programs for the benefit of the class members (the vast majority of retired players).

19. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of common benefit time spent by LLF attorneys and professional support staff of my firm who were involved in, and billed fifty or more hours to, this Action, and the lodestar calculation for those individuals based on LLF's current billing rates. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm. Time expended in preparing this application for attorney's fees and expenses has been excluded.

20. The hourly rates for the attorneys and professional support staff of my firm included in Exhibit 1 are the same as the regular rates charged for their services in other legal matters.

21. The total number of hours expended on the common benefit of this Action by my firm during the time period is 4243 hours. The total lodestar for my firm for those hours is \$3,084,500, all of which is for attorneys' time.

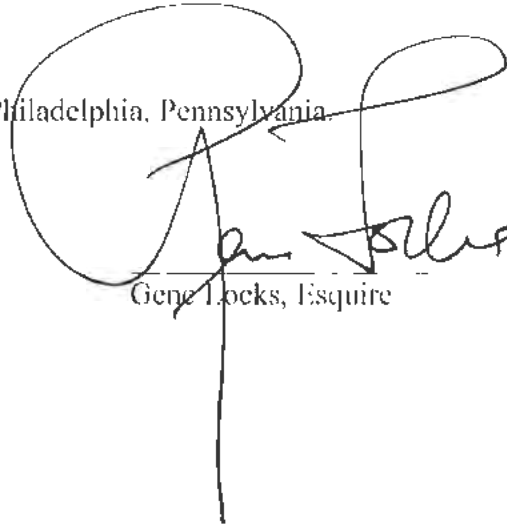
22. My firm's lodestar figures are based solely upon my firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

23. As detailed in Exhibit 2 hereto, my firm is seeking reimbursement of a total of \$639,160 in common benefit expenses incurred in connection with the prosecution of this Action. These expenses are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source material, and are an accurate record of the expenses incurred.

24. With respect to the standing of my firm to share in an award of fees, costs, and expenses, attached hereto as Exhibit 3 is a biography of my firm, including the attorneys in my firm who were principally involved in this Action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 10, 2017 in Philadelphia, Pennsylvania.

A handwritten signature in black ink, appearing to read "Gene Locks", is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long vertical stroke extending downwards. Below the line, the text "Gene Locks, Esquire" is printed.

Gene Locks, Esquire

EXHIBIT 1

**IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY
LITIGATION**

No. 12-md-2323-AB

**LOCKS LAW FIRM
610 Walnut Street, Suite 720E
Philadelphia, PA 19106
215-893-3423**

LODESTAR REPORT

Inception through July 15, 2016

NAME	HOURS	HOURLY RATE	AMOUNT
PARTNERS:			
Gene Locks	1284	\$900	\$1,155,000
David D. Langfitt	2691	\$650	\$1,749,150
Michael B. Leh	93	\$700	\$65,100
Jonathan Miller	175	\$550	\$96,250
STAFF ATTORNEYS:			
None			
CONTRACT ATTORNEYS:			
None			
PARALEGALS:			
None			
TOTALS:	4243		\$3,084,500

EXHIBIT 2

**IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY
LITIGATION**

No. 12-md-2323-AB

**LOCKS LAW FIRM
610 Walnut Street, Suite 720E
Philadelphia, PA 19106
215-893-3423**

COST AND EXPENSE REPORT

Inception through June 30, 2016

NUMBER	CATEGORY	AMOUNT
1	Assessments	\$550,000
2	Commercial Copies	
3	Computerized Research	
4	Court Reporters/Transcripts	
5	Expert Services	\$70,150
6	Facsimile	
7	Filing & Service Fees	
8	In-House Copies	
9	Long Distance Telephone	
10	Postage/Express Delivery	
11	Travel/Meals/Lodging	\$19,010
12	Miscellaneous	
TOTAL EXPENSES		\$639,160

EXHIBIT 3



About Us

Michael Leh - Locks Law Firm - Meet the Firm



One of the most prominent personal injury law firms in the tri-state region, the Locks Law Firm is steadfastly committed to protecting the rights of seriously injured victims

With a focus on mass tort and complex personal injury cases, our firm has the resources to handle any case--whether simple or complex--while still providing individual attention to each and every client. Our experienced lawyers have the knowledge to guide you throughout the legal process to achieve the best possible resolution of your case.

Who We Are

Founded by Gene Locks, the firm first distinguished itself as a leader in the development of strategies for asbestos litigation ([/practice-areas/environmental-and-toxic-torts/asbestos-mesothelioma/mesothelioma-litigation-information/](#)), successfully representing thousands of workplace exposure ([/practice-areas/environmental-and-toxic-torts/workplace-exposure/](#)) victims. Today our Pennsylvania, New Jersey, and New York personal injury lawyers are nationally and internationally prominent in numerous fields and are frequently successful in dangerous pharmaceutical ([/practice-areas/dangerous-pharmaceuticals/](#)), complex personal injury ([/personal-injury/](#)), and consumer class-action litigation ([/practice-areas/consumer-class-actions/](#)).

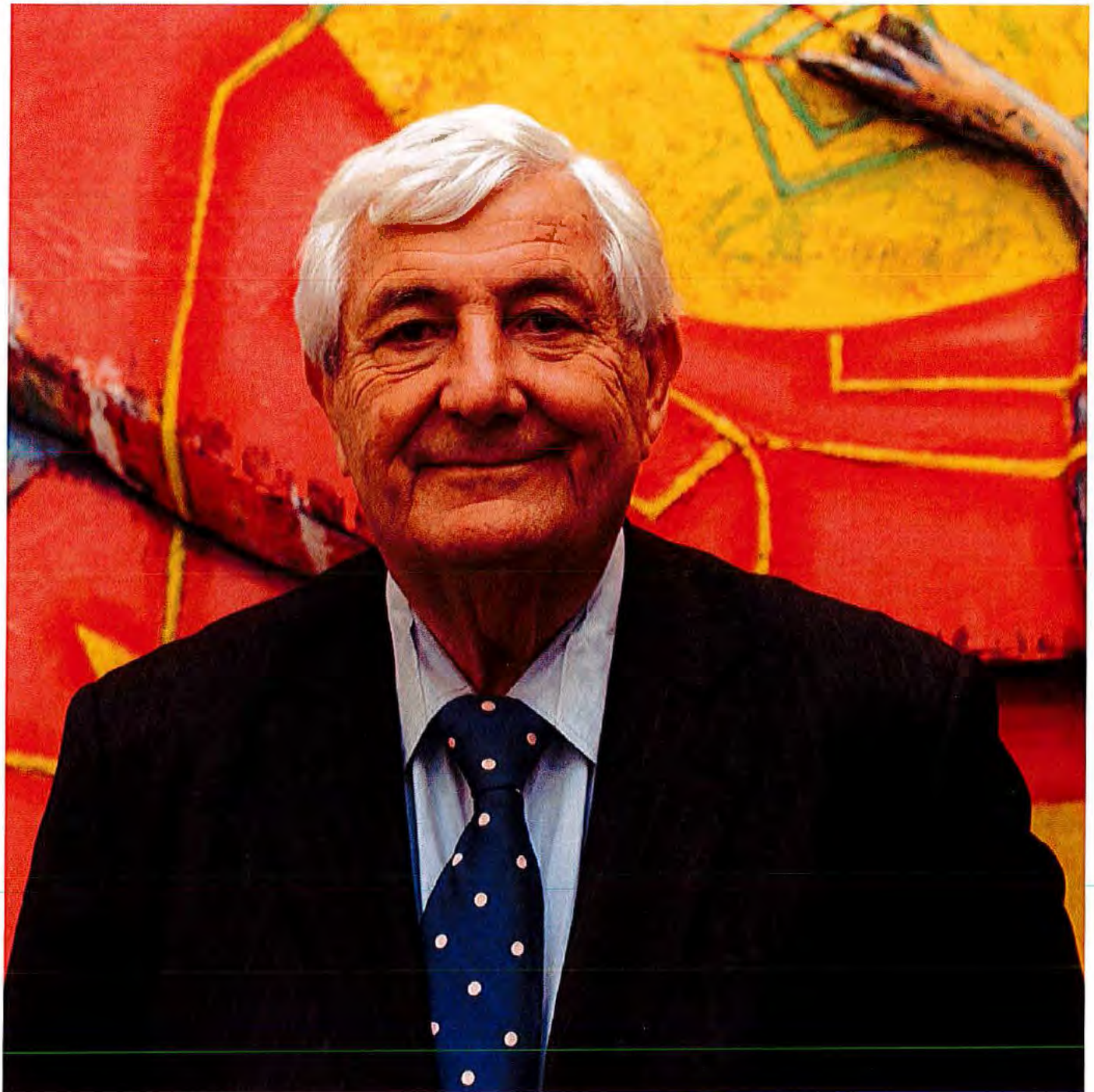
What We Do

At Locks Law Firm ([/](#)), our experienced personal injury lawyers are committed to protecting the rights of individuals and families who suffered as a result of the negligent or reckless conduct of another. We assist victims throughout Pennsylvania, New Jersey, and New York and travel to other states as needed. We **do not** represent insurance companies. The goal of our personal injury lawyers ([/team/](#)) is to promote the development of a safer society by seeking jury verdicts that take the profit out of negligent conduct and the manufacture of defective products ([/practice-areas/defective-products/](#)).


We practice law with the highest professional integrity. We thoroughly investigate and emphasize the merits of each case we handle and present them in the most organized and effective manner to insurance adjustors, opposing attorneys, and jurors. Each of our personal injury lawyers has extensive courtroom experience and our attorneys are assisted by a team of more than one hundred professionals with backgrounds in insurance, law enforcement, engineering, accident reconstruction, economic assessment, and investigation. If you have been injured and are in need of dedicated, trustworthy representation, contact our Philadelphia, New York, and New Jersey personal injury lawyers ([/contact/](#)).


L | **LOCKS LAW FIRM**

(<http://www.lockslaw.com/>)




Gene Locks, Partner

 (215) 893-3434 (tel:+12158933434)

 (215) 893-3444

 glocks@lockslaw.com (mailto:glocks@lockslaw.com)

 The Curtis Center
Suite 720 East
601 Walnut Street

Background and Experience

Gene Locks is married to Sueyun Pyo Locks and the proud father of six daughters. He resides in Philadelphia, Pennsylvania and Fisher Island, Florida.

Gene is the founding and managing partner of Locks Law Firm, a prominent national environmental, litigation, and consumer-oriented law firm formed in 1966, with offices in Philadelphia, New York and New Jersey. He is a graduate of Princeton University, and received his Doctor of Laws degree from Columbia University. He is admitted to practice law in Pennsylvania, New Jersey, New York, as well as many federal courts in the United States.

The Locks Law Firm was founded by Gene Locks, who established the Firm in Philadelphia, New York and New Jersey after more than 40 years of practice. Since then, the firm has grown into a prominent national environmental, personal injury, consumer-oriented, and complex litigation law firm.

Gene was born and raised in the Philadelphia area and is the product of the Philadelphia public school system. He has dedicated his life to representing the people of Philadelphia and beyond, who have been used and abused by the legal system. He obtains justice for the working people of the world and focuses his work exclusively on helping individuals, not corporations, obtain justice through the legal system. He is an innovator, creator, and a pioneer. Gene Locks is a true people's lawyer.

Gene was a pioneer in asbestos personal injury litigation (/practice-areas/environmental-and-toxic-torts/asbestos-mesothelioma/asbestosis/), having handled such cases and obtaining precedential verdicts in decisions in Pennsylvania, New Jersey, New York and Virginia, since 1974. Asbestos litigation has since become the largest mass tort in the United States. Gene and the personal injury attorneys at Locks Law Firm have represented in excess of 16,000 personal injury victims in more than 20 different states. Gene is co-counsel and acts in a pro hac vice capacity in both federal and state courts across the country. Gene has tried hundreds of these complex product liability (/practice-areas/defective-products/) matters. He has participated directly and as amicus in numerous appeals resulting in precedent-setting opinions in many states that have become landmark decisions on a wide spectrum of issues.

Thanks to his litigation experience, negotiating reputation and his ability to persevere and sustain lengthy litigation, Gene was appointed by the Honorable Jack B. Weinstein of the Eastern District of New York to the Management Committee of the Agent Orange Litigation, MDL 381. He directed the liability and medical aspects of the Agent Orange cases and was co-chair of the negotiating committee which, at the time, resulted in the largest class action settlement of a personal injury class of victims.

After negotiating the Agent Orange settlement, Gene became involved in other major toxic tort litigation (/practice-areas/environmental-and-toxic-torts/) primarily involving environmental and occupational exposure to hazardous substances. This led, in the early 1990s, to his being named as lead counsel in the nationally

coordinated asbestos cases. He ultimately became class counsel in a case in which an innovative and creative solution to many major asbestos litigation problems was developed. The principles developed and negotiated have become a model for recent national asbestos resolutions.

Gene served as co-lead counsel in the Asbestos Personal Injury Litigation, MDL 875 in Philadelphia for many years. He became the Chairman and Director of the Board of UNR Industries, Inc. and director of Celotex Corporation and Raytech Corporation, reorganized multi-million dollar former asbestos companies which have paid millions of dollars in benefits to hundreds of thousands of asbestos victims. Gene was chief negotiator representing victims in almost all the 20th century bankruptcy re-organizations. Gene and the attorneys of Locks Law Firm have also represented numerous school districts and other entities across the nation in property damage cases arising from asbestos exposure.

In the late 1990s, Gene and Locks Law Firm attorneys filed class actions in the Diet Drug (Fen-Phen®) Litigation in New York, Pennsylvania and New Jersey. Gene was co-lead negotiator in that litigation which culminated in a 3.75 billion dollar settlement of those claims (in Brown v. American Home Products Corp, MDL 1203).

Gene, a former quarterback in college and high school, is a man who plays to win. He chooses to represent those with just positions who deserve to win against the abuses created by large global companies. Nationally and internationally, he and the firm fight to right the injustices of corporate misbehavior by helping individuals to obtain their fair day in court. A born leader, Gene is known for creating winning teams that bring people justice.

Business Activities

Chairman, UNR Industries, Inc. (NASDAQ), 1991 - 1999

Director, UNR Industries, Inc., 1989 - 2002

Director, Celotex Corporation, 1997 - 2001

Chairman, APEX Teletech Resources, Inc., 1996 - 1997

President, Locks Investments, Ltd., 1990 - Present

Director, Raytech Industries, Inc. (NASDAQ), 2001 - 2009

Personal Activities

Chairman, Board of Managers - The Philadelphia Foundation, one of the largest community foundation in a U.S. city, 1999 - Present,

Board of Managers - The Philadelphia Liberty Medal, 2005

Advisory Board Chairman Fund for Children - 2006

Trustee and Chairman, Asbestos Victims Special Fund Trust, 1988 - 1996

Board Member - Oceanside Five Condominium Association - 2006 - Present

Outside the Office

Gene Locks is married to Sueyun Pyo Locks and the proud father of six daughters. He resides in Philadelphia, Pennsylvania and Fisher Island, Florida. Although his first love is the Princeton Tigers, during baseball season, he can often be found cheering on the St. Louis Cardinals.

Blog Posts

APPEALS DENIED - NFL CONCUSSION SETTLEMENT FINAL (<http://www.lockslaw.com/blog/2016/12/12/appeals-denied-nfl-concussion-settlement-final/>)

NFL Concussion Appeal Filed with U.S. Supreme Court Means More Delays

(<http://www.lockslaw.com/blog/2016/09/02/nfl-concussion-appeal-filed-with-u-s-supreme-court-means-more-delays/>)

Legendary All-Pro Football Player Bubba Smith the Latest to be Diagnosed with CTE

(<http://www.lockslaw.com/blog/2016/05/27/legendary-football-player-bubba-smith-the-latest-to-be-diagnosed-with-cte/>)

A Message From The Locks Law Firm - Proposed NFL Concussion Litigation Settlement

(<http://www.lockslaw.com/blog/2013/08/29/a-message-from-the-locks-law-firm-proposed-nfl-concussion-litigation-settlement/>)



Practice Areas

Asbestos Exposure (</practice-areas/environmental-and-toxic-torts/asbestos-mesothelioma/>)

Toxic Torts (</practice-areas/environmental-and-toxic-torts/>)

Dangerous Pharmaceuticals (</practice-areas/dangerous-pharmaceuticals/>)

Product Liability (</practice-areas/consumer-class-actions/>)

Environmental Litigation (</practice-areas/environmental-and-toxic-torts/>)

Professional Negligence

Admitted to Practice

Pennsylvania, New York, New Jersey, District of Columbia as well as many federal courts in the United States

Education

Columbia University School of Law, J.D. 1962

Princeton University, B.A. 1959

Professional Affiliations

American Association for Justice

Board Affiliations and Appointments

Lead counsel in numerous major national litigation matters and either chairman or member of numerous Chapter 11 reorganization committees involving large manufacturing companies and lead or class counsel in major national class action proceedings.

Co-Lead Class Counsel of Brown, et al. v. American Home Products Corporation

Diet Drug Class Action and Civil Action No. 99-20593, 1999-present

Co-Lead Class Counsel of Georgine, et al. v. Amchem Products, et al

Asbestos Victim Class Action and Civil Action No.9.-CV-0215, 1992-1997

Member and Co-Chairman

Agent Orange Plaintiffs' Management Committee and Negotiating and Causation Sub-Committees, 1983-1987

Chairman and/or Lead Negotiator of the following reorganized companies:

Official Creditors Committee of Asbestos-Related Plaintiffs

MANVILLE Chapter 11 Proceeding, a successfully reorganized public company, in New York, New York Bankruptcy Court, 1982 - 1988

UNR INDUSTRIES, INC.

Chapter 11 Proceedings, a successfully reorganized public company, in Chicago, Illinois Bankruptcy Court, 1982 - 1989

THE CELOTEX CORPORATION

Chapter 11 Proceeding, a successfully reorganized company, in Tampa, Florida Bankruptcy Court, 1990 - 1997

EAGLE-PICHER INDUSTRIES, INC., a successfully reorganized public company, in Cincinnati, Ohio Bankruptcy Court, 1991 - 1996

RAYTECH INDUSTRIES, INC., a successfully reorganized public company, in Connecticut Bankruptcy Court, 2001.

Numerous Lead Counsel roles in various state court coordinated case management complex litigation matters.

Certifications and Awards

Pennsylvania Association for Justice Stalwart Award

NJ Bar Association William A Dreier Award Winner - 2012

Do I have a case? Free Case Evaluation

(/contact/)



(http://www.facebook.com/pages/Locks-Law-



Firm/1



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us

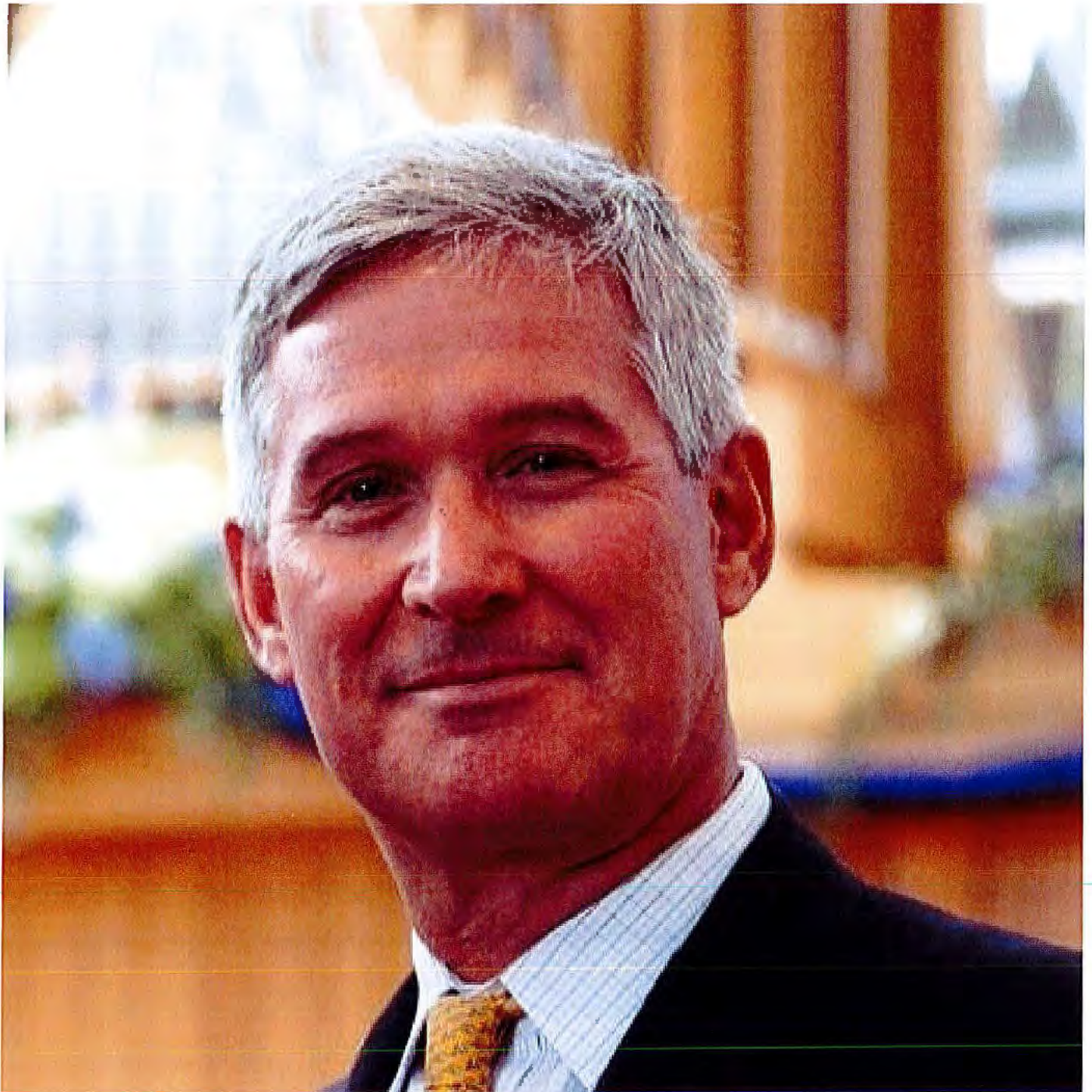


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ref=ts)(http://www.lockslaw.com/team/gene-lockslawcom)


L | LOCKS LAW FIRM

(<http://www.lockslaw.com/>)




David D. Langfitt, Partner

 (215) 893-3423 (tel:+12158933423)

 (215) 893-3444

 dlangfitt@lockslaw.com (mailto:dlangfitt@lockslaw.com)

 The Curtis Center
Suite 720 East
601 Walnut Street

Background and Experience

David Langfitt has practiced complex commercial litigation for more than twenty-three years and specializes in litigation and trials involving numerous parties, claims, and courts, both state and federal. He has litigated a wide variety of complex cases involving mass tort claims, the federal securities laws, professional liability, merger agreements, pre-packaged bankruptcy plans, fraud, breach of fiduciary duty, and infringement of patents and copyrights.

Mr. Langfitt is on the Court-appointed Plaintiffs' Executive Committee in the NFL Concussion Litigation. He is among the leaders of that ongoing litigation in which the Locks Law Firm represents more than 1600 former players against the NFL for latent and existing brain injury. He has also been lead counsel in the Artelon Spacer Litigation, a medical device mass tort in the Philadelphia Court of Common Pleas.

At the same time, he serves as nationwide patent litigation counsel to Q.I. Press Controls, an international technology company based in Holland. He has represented QI in multiple cases in courts throughout the United States that have involved patent infringement disputes and disputes that arose out of patent re-examinations within the U.S. Patent and Trademark office. Representative opinions can be found at *Quad/Tech v. QI Press Controls, et al.*, 701 F. Supp. 2d 644 (E.D. Pa. 2010), *aff'd*, 2011 U.S. App. LEXIS 5729 (Fed. Cir. 2011) and *QI Press Controls v. Lee*, 752 F.3d 1371 (Fed. Cir. 2014).

Prior to joining the Locks Law Firm, Mr. Langfitt was a partner at Montgomery, McCracken, Walker & Rhoads LLP in Philadelphia from 1999 to 2010. During that time period, Mr. Langfitt represented Federal Receiver David H. Marion, appointed at the request of SEC to recover, oversee, and distribute to more than one thousand defrauded investors the assets of a Ponzi Scheme operated through Bentley Financial Services, Inc. of Paoli, PA. The Bentley Scheme was the largest Ponzi Scheme in the United States when it was discovered in 2001. Eleven years of experience includes:

- Recovered approximately \$360,000,000 for the benefit of defrauded investors, which is approximately ninety-three percent of the investors' principal.

- Filed and litigated multiple complaints against banks and others for aiding and abetting and conspiring with the Ponzi Scheme.

- Investigated and pursued off-shore assets in Caribbean and South Pacific nations.

- Operated Receivership as business entity that successfully marshaled assets, conducted litigation, distributed recovered assets, and regularly communicated through a public website with more than one thousand defrauded investors regarding claims, distribution, and litigation process.

Mr. Langfitt also has extensive experience litigating in the bankruptcy courts and has represented creditors in *In Re: Bondex* (U.S. District Court, District of Delaware), *In Re: Combustion Engineering* (U.S. District Court, District of Delaware), and *In Re: Nutraquest* (U.S. District Court, District of New Jersey).

Mr. Langfitt also served as lead litigation counsel to Celotex Corporation in (a) 551 wrongful death and personal injury cases brought in connection with 2003 fire at The Station nightclub in West Warwick, Rhode Island; (b) personal injury cases brought in connection with manufacturing plants in multiple states; (c) in negotiations with USEPA regarding environmental regulations, control equipment, and clean air act issues; and (d) contract litigation over the sale of manufacturing plants nationwide.

While an associate at Montgomery McCracken, Mr. Langfitt was *Habeas Corpus* counsel to a former death row inmate and succeeded in overturning the petitioner's conviction for first degree murder in *Smith v. Horn*, 120 F.3d 400 (3d Cir. 1997).

Personal

Trustee, Philadelphia Museum of Art
Trustee, The Episcopal Academy
Board of Directors, Episcopal Community Services
Board of Directors, Lankenau Institute for Medical Research
Former Chair, Philadelphia Mural Arts Program

Outside the Office

Mr. Langfitt is married with three children. Prior to becoming a lawyer, he was professional painter living and working in New York City. Some of his work is owned by the School of American Ballet, The United States Federal Courts, The University of Pennsylvania, and The College of Physicians of Philadelphia.

Blog Posts

Locks Attorney David Langfitt Talks Youth Sports and the Law (<http://www.lockslaw.com/blog/2016/05/24/locks-attorney-david-langfitt/>)

Buyer Beware: Switching Counsel is at an All-Time High in the NFL Concussion Litigation (<http://www.lockslaw.com/blog/2016/02/08/buyer-beware-switching-counsel-is-at-an-all-time-high-in-the-nfl-concussion-litigation-2/>)

Legendary N.F.L. Player Ken Stabler Diagnosed with C.T.E.
(<http://www.lockslaw.com/blog/2016/02/03/legendary-n-f-l-player-ken-stabler-diagnosed-with-c-t-e/>)

LLF Attorney David Langfitt Interviewed about Youth Sports (<http://www.lockslaw.com/blog/2015/12/14/llf-attorney-david-langfitt-interviewed-about-youth-sports/>)

Third Circuit Sets Date for Oral Argument in NFL Concussion case
(<http://www.lockslaw.com/blog/2015/09/11/third-circuit-sets-date-for-oral-argument-in-nfl-concussion-case/>)





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(<http://www.lockslaw.com/>)




Michael B. Leh, Partner

 (215) 893-3410 (tel:+12158933410)

 (215) 893-3444

 mleh@lockslaw.com (mailto:mleh@lockslaw.com)

 The Curtis Center
Suite 720 East
601 Walnut Street

Background and Experience

Michael Leh has been Managing Partner of the Locks Law Firm since 2003 and is a member of the firm's Management Committee. He joined the firm as a law clerk while attending evening division law school in 1983. Mr. Leh specializes in mass torts and other complex litigation. He is a member of the bars of Pennsylvania and New Jersey and has tried cases in state and federal courts throughout the country. His verdicts in *Coyne vs. Celotex Corp., et. al.* and *McCoubry vs. Celotex Corp., et al.* were the largest verdicts in the United States in 1988, totaling over \$150 million. He has tried over 100 jury and bench trials and has obtained numerous other seven-figure verdicts.

Mr. Leh has represented plaintiffs in asbestos litigation, numerous pharmaceutical and medical device litigations, environmental cases, occupational benzene cases, and other complex litigations, including the NFL Concussion Litigation. He has written and spoken on various topics related to complex personal injury cases and has been featured in a number of national publications.

Outside the Office

When not dealing with his job or his five children and his grandchildren, Michael most enjoys nature, whether hiking, kayaking, or just sitting and silently appreciating his surroundings.

Blog Posts

Justice is Near for South African Gold Miners (<http://www.lockslaw.com/blog/2016/06/22/justice-is-near-for-south-african-gold-miners/>)

We Will Always Need Lawyers as Victims Will Always Need Justice

(<http://www.lockslaw.com/blog/2016/05/16/we-will-always-need-lawyers-as-victims-will-always-need-justice/>)

Key Asbestos Decision Expected (<http://www.lockslaw.com/blog/2016/04/21/1415/>)

Amtrak Crash Kills Two, Leaves Dozens Injured (<http://www.lockslaw.com/blog/2016/04/04/amtrak-crash-kills-two-leaves-dozens-injured/>)

Defending the Right to Class Action Lawsuits (<http://www.lockslaw.com/blog/2015/12/11/defending-the-right-to-class-action-lawsuits/>)



Practice Areas

Toxic Torts (/practice-areas/environmental-and-toxic-torts/)
Asbestos Exposure (/practice-areas/environmental-and-toxic-torts/asbestos-mesothelioma/)
Dangerous Pharmaceuticals (/practice-areas/dangerous-pharmaceuticals/)
Chemical Exposure (/practice-areas/environmental-and-toxic-torts/chemical-exposure/)
Environmental Litigation (/practice-areas/environmental-and-toxic-torts/)
Complex Personal Injury

Admitted to Practice

Pennsylvania (1985)
New Jersey (1985)
US District Court, Eastern District of Pennsylvania
US District Court, Middle District of Pennsylvania
US District Court, New Jersey
US Court of Appeals, Third Circuit

Education

Bachelor of Arts Temple University, 1979 (cum laude)
Juris Doctor, Temple University School of Law, 1985

Professional Affiliations

American Association for Justice
American Bar Association
Pennsylvania Bar Association
Pennsylvania Association for Justice
Philadelphia Association for Justice

Do I have a case? Free Case Evaluation

(/contact/)



(http://www.facebook.com/pages/Locks-
Law-



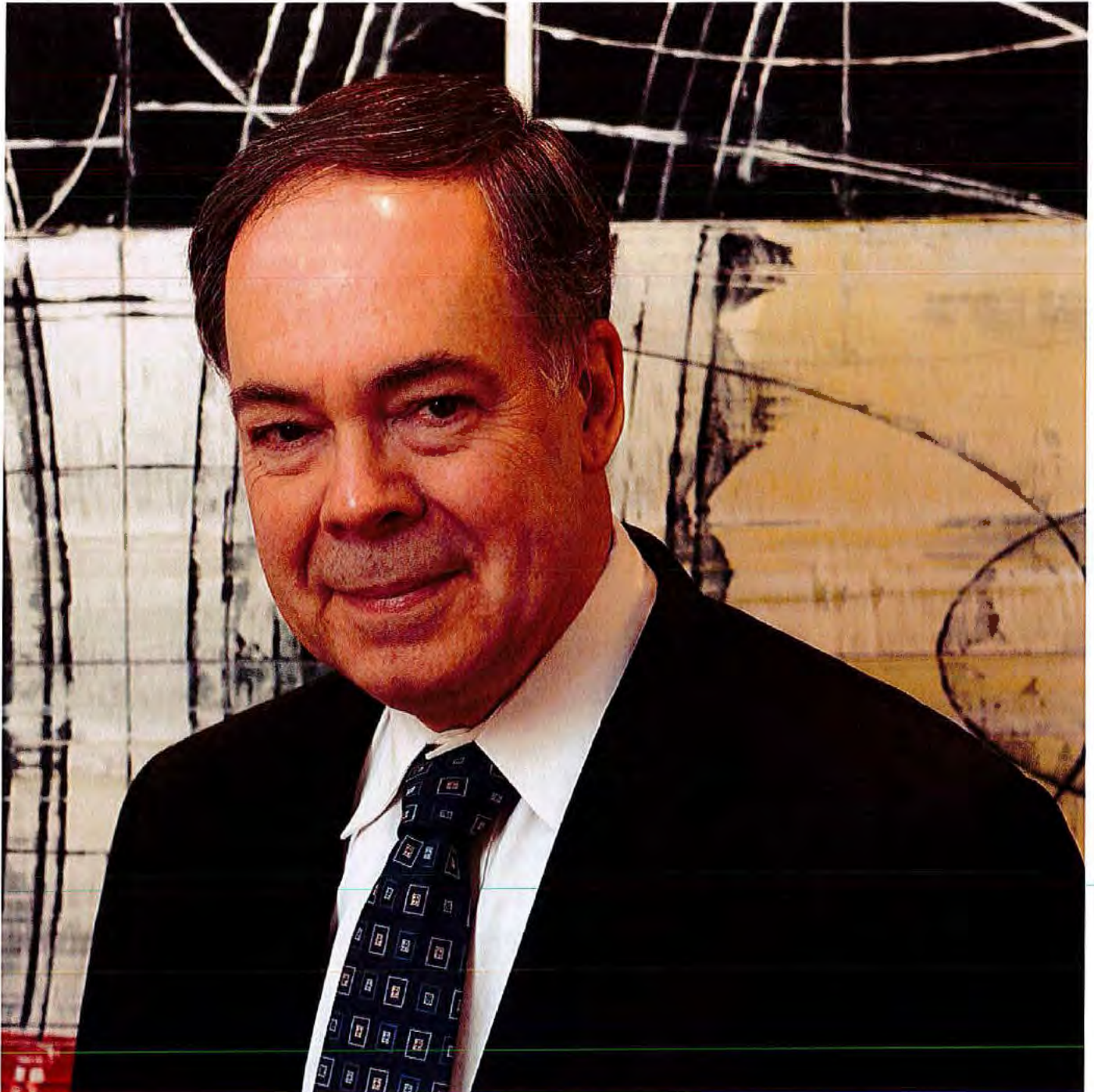
Firm/10554125125?ts=110627341449105257994?




ref=ts)(http://www.lockslaw.com/team/michael-b-leh/)


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(<http://www.lockslaw.com/>)




Jonathan W. Miller, Partner

 (215) 893-3405 (tel:+12158933405)

 (215) 893-3444

 jmillers@lockslaw.com (mailto:jmillers@lockslaw.com)

 The Curtis Center
Suite 720 East
601 Walnut Street

Background and Experience

Jonathan Miller is a partner who specializes in appellate practice and complex litigation. He has written and argued appellate briefs in the Pennsylvania and New Jersey appellate courts as well as the United States Courts of Appeals for the Third and Ninth Circuits. He has participated in appeals that changed the law. A significant victory was as an amicus curiae on behalf of the New Jersey Association for Justice in *Nicastro v. McIntyre Machinery America, Ltd.*, 201 N.J. 48, 987 A.2d 575 (2010), in which the New Jersey Supreme Court adopted his argument that the realities of globalization should be considered in applying the stream of commerce theory of personal jurisdiction. The *Nicastro* case subsequently went to the US Supreme Court, where Mr. Miller was the lead author of an amicus brief on behalf of the American Association for Justice.

Another case stopped the retroactive application of law that barred claims of increased risk and fear of asbestos-related cancer. See *Cleveland v. Johns-Manville Corp.*, 547 Pa. 402, 690 A.2d 1146 (1997). Another addressed the novel issue in New Jersey of apportionment of damages for lung cancer between asbestos exposure and cigarette smoking. See *Dafler v. Raymark Industries, Inc.*, 259 N.J. Super. 17, 611 A.2d 136 (App. Div. 1992), affirmed, 132 N.J. 96, 622 A.2d 1305 (1993) (per curiam). He submitted amicus curiae briefs on the issues of set-offs in strict liability verdicts, see *Baker v. AC&S, Inc.*, 562 Pa. 290, 755 A.2d 664 (2000), and of costs on behalf of the Pennsylvania Association for Justice in the landmark Paoli Railroad Yard PCB Litigation cases. See *In re: Paoli Railroad Yard PCB Litigation*, 221 F.3d 449, 465-66 & n.8 (3rd Cir. 2000). He was in charge of appellate briefing and argument on the issue of forum non conveniens on behalf of all United Kingdom residents who filed suit in New Jersey state court for injuries caused by Vioxx. See *In re Vioxx Litigation*, 395 N.J. Super. 358, 928 A.2d 935 (App. Div.), cert. denied, 193 N.J. 221, 936 A.2d 968 (2007).

He was Chief of Appeals in the Defender Association of Philadelphia prior to joining Locks Law Firm. As an assistant public defender, one of his cases established Pennsylvania law on the withdrawal of guilty pleas. See *Com. v. Forbes*, 450 Pa. 185, 299 A.2d 268 (1973). Another won a complicated question of federal-state immunity, see *Com. v. Fattizzo*, 223 Pa. Super. 378, 299 A.2d 22 (1972).

Complex Litigation

Mr. Miller has extensive experience in complex litigation of all types, including class actions. In Hazleton, PA, service stations leaked gasoline from their underground storage tanks, polluting a residential area, sickening or killing over a dozen of the neighbors and lowering the value of 400 homes. From 2000 to 2010, he was the partner in charge of day to day prosecution of the Hazleton environmental lawsuits involving 1100 neighbors as plaintiffs against four major oil companies and over a dozen additional defendants. He has previously litigated asbestos property damage and personal injury cases in Denver, Chicago, New York and Kentucky, in addition to medical

device and breach of contract cases in Philadelphia. He litigated over a thousand criminal cases as an assistant public defender where, in addition to being Chief of Appeals, he was Chief of Motions and Juvenile and an assistant federal defender. Mr. Miller also litigated a medical negligence case in Wilkes-Barre, PA in 2015.

He has participated in major asbestos bankruptcies. In a rare honor, he was accepted in the Celotex bankruptcy as an expert witness on the subject of asbestos property damage. He has participated in ground-breaking asbestos class action and bankruptcy settlements, including Amchem, Diet Drugs, and Celotex.

Outside the Office

Jonathan served the poor as a Philadelphia public defender for 15 years. He likes to read, listen to classical music and serve his church.

Blog Posts

Recent Positive Developments in Mesothelioma Lawsuits (<http://www.lockslaw.com/blog/2016/11/29/good-news-for-mesothelioma-victims/>)

Videos show what happened, but can police refuse to produce them?

(<http://www.lockslaw.com/blog/2016/11/23/videos-show-what-happened-but-can-police-refuse-to-produce-them/>)

Tulsa, Oklahoma and the Right to Know Law (<http://www.lockslaw.com/blog/2016/09/21/tulsa-oklahoma-and-the-right-to-know-law/>)

The Pennsylvania Right to Know Law is a Great Tool (<http://www.lockslaw.com/blog/2016/08/24/the-pennsylvania-right-to-know-law-is-a-great-tool/>)

Videos Are Powerful, and Police Dash Cam Videos Are Discoverable

(<http://www.lockslaw.com/blog/2016/07/08/videos-are-powerful-and-police-dash-cam-videos-are-discoverable/>)

Practice Areas

Toxic Torts (</practice-areas/environmental-and-toxic-torts/>)

Complex Litigation

Class Actions (</practice-areas/consumer-class-actions/>)

Trial Practice

Appellate Practice (</practice-areas/other-practice-areas/appeals-appellate-work/>)

Admitted to Practice

Pennsylvania (1970);

U.S. District Court, Eastern District of Pennsylvania (1971);

U.S. Court of Appeals, Third Circuit (1972);

U.S. Supreme Court (1986);

U.S. District Court, Middle District of Pennsylvania (1986);

New Jersey (1987);

U.S. District Court, District of New Jersey (1986);

U.S. Court of Appeals, Tenth Circuit (1988);

New York Supreme Court, Third Department (1997);

U.S. Court of Appeals, Ninth Circuit (2011);

U.S. District Court, Southern District of New York (2013)
U.S. District Court, Eastern District of New York (2013).

Education

Yale University, cum laude, 1967

University of Pennsylvania, cum laude, Order of the Coif, and Law Review, 1970

Professional Affiliations

New Jersey Association for Justice

Pennsylvania Association for Justice

American Association for Justice

3rd Circuit Bar Association

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